

ATTACHMENT 13

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

4 CISCO SYSTEMS, INC.

5 Plaintiff,

6 | VS.

7 ARISTA NETWORKS, INC., Case No.

8 Defendant. 5:14-cv-5344-BLF

9

5:14-cv-

12 HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY

13 | SUBJECT TO PROTECTIVE ORDER

15 VIDEOTAPED DEPOSITION OF ADAM SWEENEY

16 VOLUME 11

18 | Page January 29, 2016

19 9:32 a.m. - 6:48 p.m.

21 555 Twin Dolphin Drive 5th Floor

22 Redwood Shores, California

23 | REPORTED BY:

24 James Beasley

25 | CSR No. 12807, CCR No. 835, RPR

<p>1 design specs for their products.</p> <p>2 Q. Anything else?</p> <p>3 A. Those are the main things I can think of.</p> <p>4 Q. Were you given access to confidential</p> <p>5 roadmaps of product lines while you were employed by</p> <p>6 Cisco?</p> <p>7 A. Probably.</p> <p>8 MR. FERRALL: Objection. Compound.</p> <p>9 You can answer.</p> <p>10 THE WITNESS: I probably had access to the</p> <p>11 roadmaps for my own business unit's products and</p> <p>12 maybe high level descriptions for those related to</p> <p>13 business units.</p> <p>14 BY MR. PAK:</p> <p>15 Q. And what are roadmaps?</p> <p>16 A. A roadmap is generally a plan.</p> <p>17 Q. A plan for what in this context?</p> <p>18 A. It would usually be a plan for products</p> <p>19 you're planning to build.</p> <p>20 Q. And you understood as an employee of Cisco</p> <p>21 that product roadmaps within Cisco were confidential</p> <p>22 information owned by Cisco; you knew that, right?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. Highly sensitive information in</p> <p>25 terms of what you were trying to build for the</p>	<p>Page 94</p> <p>1 things are not done yet and they may change.</p> <p>2 Q. Do you consider Cisco to be a competitor</p> <p>3 of Arista in the Ethernet switching market?</p> <p>4 A. Yes.</p> <p>5 Q. As the VP of software engineering, would</p> <p>6 you feel comfortable sharing your software feature</p> <p>7 roadmap for Arista's future products with employees</p> <p>8 of Cisco?</p> <p>9 A. No.</p> <p>10 Q. Why not?</p> <p>11 A. We compete with Cisco; we don't need them</p> <p>12 to know what our plans are before they become</p> <p>13 public.</p> <p>14 Q. Why is that important to your business,</p> <p>15 that you keep confidential roadmaps for software</p> <p>16 features away from the hands of competitors like</p> <p>17 Cisco?</p> <p>18 A. It prevents them from preparing for the</p> <p>19 arrival of those features.</p> <p>20 Q. We've talked about some confidential</p> <p>21 information of Arista on the record today, correct?</p> <p>22 A. I think so.</p> <p>23 Q. Can you think of anything that we've</p> <p>24 discussed so far that's truly confidential to</p> <p>25 Arista?</p>
<p>1 future, correct?</p> <p>2 A. Sometimes.</p> <p>3 Q. And within Arista you also are given</p> <p>4 access to confidential, sensitive roadmaps for</p> <p>5 future products in Arista, correct?</p> <p>6 A. Yes.</p> <p>7 Q. And you consider that to be confidential</p> <p>8 to Arista and act accordingly, true?</p> <p>9 A. Yes.</p> <p>10 Q. You would not want confidential roadmaps</p> <p>11 of Arista to be shared with Arista's competitors,</p> <p>12 would you?</p> <p>13 A. Again, it depends on the roadmap, the</p> <p>14 timing of it, what's in it. Sometimes these things</p> <p>15 become public over time.</p> <p>16 Q. But you are certainly aware of</p> <p>17 confidential roadmaps of Arista that have not been</p> <p>18 shared, to your knowledge, with competitors of</p> <p>19 Arista, correct?</p> <p>20 A. I can think of at least one.</p> <p>21 Q. Okay. What is that one that you are</p> <p>22 thinking of?</p> <p>23 A. Would be our software features roadmap.</p> <p>24 Q. And why is that confidential to Arista?</p> <p>25 A. Certainly one reason is because these</p>	<p>Page 95</p> <p>Page 97</p> <p>1 MR. FERRALL: Objection. Vague and</p> <p>2 ambiguous.</p> <p>3 THE WITNESS: Actually, I'm sorry, I'm not</p> <p>4 sure. It's hard for me to remember every little</p> <p>5 thing we've talked about.</p> <p>6 MR. PAK: What I'm going to now do is put</p> <p>7 that manual to work. So I am going to introduce my</p> <p>8 next exhibit, Exhibit 120.</p> <p>9 THE WITNESS: Okay.</p> <p>10 (Sweeney Exhibit 120 was marked for</p> <p>11 identification and attached to the</p> <p>12 transcript.)</p> <p>13 (Off-the-record discussion.)</p> <p>14 BY MR. PAK:</p> <p>15 Q. Mr. Sweeney, I've labeled as Exhibit 120 a</p> <p>16 document that was filed as part of this case, and</p> <p>17 it's a document with the Docket number 64-1, which</p> <p>18 was filed on July 23rd, 2015.</p> <p>19 What I'm going to ask you to do,</p> <p>20 Mr. Sweeney, is take whatever time you need to go</p> <p>21 through these commands that are identified here.</p> <p>22 A. Okay.</p> <p>23 Q. And you can check the manual, the user</p> <p>24 manual, which is Exhibit 119, and at the end of your</p> <p>25 review I would like to have you confirm that each of</p>

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1 the commands that have been identified as part of
2 this Exhibit 120 is, in fact, implemented as part of
3 Arista's CLI commands.

4 Can you do that for me?

5 A. The whole list?

6 Q. Yes.

7 A. That's --

8 MR. FERRALL: Are you asking him one
9 question to answer or are you going to -- I'm not
10 sure. I mean, if you want to -- obviously you can
11 do it however you want, but...

12 MR. PAK: Counsel, I'm going to just -- so
13 I think my instruction is pretty clear.

14 Q. I'm going to ask you to review this list,
15 I want you, if you need it, to compare it to the
16 list of commands that are described in Exhibit 119,
17 which is the user manual for the Arista CLI.

18 And at the end of the review I'm going to
19 ask you to confirm on the record that all of the CLI
20 commands that appear in Exhibit 120 has, in fact,
21 been implemented by Arista as part of its CLI.

22 Do you understand?

23 A. I do.

24 Q. Okay. So please go ahead and take
25 whatever time you need to do that for me.

Page 100
1 And please feel free to review Exhibit 119
2 in answering that question.

3 MR. FERRALL: Objection. Compound. Vague
4 and ambiguous.

5 THE WITNESS: So --

6 MR. FERRALL: Why don't you --

7 THE WITNESS: -- the only way I feel I
8 could actually answer that is to go through every
9 one of them.

10 MR. PAK: Please do.

11 MR. FERRALL: I think that's what he's
12 asking you to do.

13 MR. PAK: And there's a table of contents
14 in Exhibit 119, if it's helpful.

15 But please go ahead and do that.

16 THE WITNESS: All righty.

17 No. I would say the answer is no.

18 BY MR. PAK:

19 Q. Okay. Can you identify for me which
20 command you believe has not been implemented by
21 Arista CLI?

22 A. I would say that there is no command that
23 consists of just the two words "aaa" followed by
24 "accounting."

25 Q. Okay. And let's take a look at, what is

Page 99
1 MR. FERRALL: When -- when should we tell
2 you when -- what should Mr. Sweeney be able to say
3 when he's done with this review session?

4 MR. PAK: I'm confused.

5 MR. FERRALL: Well, I'm confused because
6 if you're going to -- if you want to pose the
7 question here that he's going to answer, then at the
8 end then I -- I guess we could do that.

9 It sounds like it's a massively compound
10 question, but I guess that's up to you to pose it.
11 Or we can just take some time and then he can start
12 looking through these materials. Is that what you
13 want him to do?

14 MR. PAK: Let me ask it and then you
15 can --

16 Q. So I'm just going to -- I've explained to
17 you what I would like you to do. Do you understand
18 what I've asked you to do, Mr. Sweeney?

19 A. I think so.

20 Q. Okay. So let me ask you my question so
21 your attorney can make an objection, if he would
22 like.

23 Mr. Sweeney, is it true that all of the
24 commands that are identified in Exhibit 120 has been
25 implemented in the Arista CLI interface?

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1 the command syntax for the command that you're
2 looking at right now? Can you identify the page
3 number?

4 A. I'm looking at Page 205.

5 Q. Okay. And what --

6 A. Bates 16205.

7 Q. Okay. And what's the command syntax for
8 that command?

9 A. There's an "accept" command. It has a
10 variable number of incarnations. But it's "aaa,"
11 followed by "accounting," followed by a type
12 specifier followed by a connection specifier
13 specified by a mode, followed by a mode, followed by
14 a series -- you know, one or more methods.

15 Q. Okay. So I'm going to ask you this
16 question, then, we'll do it one command at a time
17 now, and then I'll ask you to do this.

18 A. Okay.

19 Q. Can you confirm for me that the command
20 "aaa accounting" that is described on Page 205 of
21 Exhibit 119 contains the multiple words
22 "aaa accounting"?

23 A. Yes, it does.

24 Q. And, in fact, at the very top it says:
25 "aaa accounting," as the title for that particular

<p style="text-align: right;">Page 102</p> <p>1 command?</p> <p>2 A. That is a prefix for this command, yes.</p> <p>3 Q. Okay. Let's turn to the next one, which</p> <p>4 is on the next page, Page 206. Can you confirm that</p> <p>5 "aaa accounting dot1x" is present in the command</p> <p>6 "aaa accounting dot1x" from Arista CLI?</p> <p>7 A. No, it's not.</p> <p>8 Q. Can you confirm that the words</p> <p>9 "aaa accounting dot1x" in combination appears in the</p> <p>10 command "aaa accounting dot1x" in Arista CLI?</p> <p>11 A. No.</p> <p>12 Q. At the very top, the command says:</p> <p>13 "aaa accounting dot1x."</p> <p>14 Is that true?</p> <p>15 A. That is the title of this page, yes.</p> <p>16 Q. Okay. And that's the title of this page</p> <p>17 for the "aaa accounting dot1x" command; is that</p> <p>18 true?</p> <p>19 A. No.</p> <p>20 Q. Okay. Let's look at the command syntax.</p> <p>21 "aaa accounting dot1x" is part of the</p> <p>22 command syntax for the command identified on</p> <p>23 Page 206, correct?</p> <p>24 A. For which command identified on Page 206?</p> <p>25 There's more than one.</p>	<p style="text-align: right;">Page 104</p> <p>1 THE WITNESS: I'm sorry, could you read</p> <p>2 your question one more time?</p> <p>3 BY MR. PAK:</p> <p>4 Q. Sure. Isn't it true, Mr. Sweeney, that</p> <p>5 each of the multiple word command phrases that</p> <p>6 appear in Exhibit 120 is part of the command syntax</p> <p>7 for CLI commands that are used in Arista CLI?</p> <p>8 MR. FERRALL: Same objection.</p> <p>9 THE WITNESS: Well, let's continue our</p> <p>10 merry adventure.</p> <p>11 (Reading.)</p> <p>12 THE WITNESS: Well, according to this</p> <p>13 document, no.</p> <p>14 BY MR. PAK:</p> <p>15 Q. Okay. Can you show me which page you're</p> <p>16 looking at?</p> <p>17 A. I'm looking at Page 1514.</p> <p>18 Q. Okay. 1513. Page 1513, are you looking</p> <p>19 at the --</p> <p>20 A. 14. What claims to be the documentation</p> <p>21 for the "address family" command.</p> <p>22 Q. Okay. And why do you believe that the --</p> <p>23 (Off-the-record discussion regarding the</p> <p>24 microphone.)</p> <p>25 ///</p>
<p style="text-align: right;">Page 103</p> <p>1 Q. Sure. The first command identified on</p> <p>2 Page 206.</p> <p>3 A. Sorry, do you want to -- like say your</p> <p>4 question, again.</p> <p>5 Q. Sure. The words "aaa accounting dot1x" is</p> <p>6 part of the command syntax for the first command</p> <p>7 that is described in Exhibit 119 on Page 206,</p> <p>8 correct?</p> <p>9 A. Yes, it is a prefix of that command, yes.</p> <p>10 Q. Okay. And that command description,</p> <p>11 "aaa accounting dot1x," also appears at the very top</p> <p>12 page of 206; is that true?</p> <p>13 A. It does.</p> <p>14 Q. Okay. So what I'm going to ask you to do</p> <p>15 is confirm for me that -- let me ask it -- let me</p> <p>16 ask you a question.</p> <p>17 Isn't it true, Mr. Sweeney, that each of</p> <p>18 the multiple word command phrases that appear in</p> <p>19 Exhibit 120 is part of the command syntax for CLI</p> <p>20 commands that are used in Arista CLI?</p> <p>21 And please take the time as necessary to</p> <p>22 confirm that and also check with Exhibit 119 as</p> <p>23 necessary.</p> <p>24 MR. FERRALL: Objection. Lacks</p> <p>25 foundation. And vague and ambiguous. And compound.</p>	<p style="text-align: right;">Page 105</p> <p>1 BY MR. PAK:</p> <p>2 Q. And why is it that you believe</p> <p>3 "address-family" is not part of the command syntax</p> <p>4 for this command?</p> <p>5 A. Well, when I read the command syntax</p> <p>6 section, there's no mention of it.</p> <p>7 Q. Are you familiar with this command?</p> <p>8 A. I'm not sure.</p> <p>9 Q. For example, can you look at the example</p> <p>10 at the bottom, can you read into the record the</p> <p>11 second example command -- the second example of the</p> <p>12 command that's entered in the Arista CLI?</p> <p>13 A. There it shows a command:</p> <p>14 "address-family ipv6."</p> <p>15 Q. So if, in fact, that turns out to be the</p> <p>16 command syntax for "address-family" command of the</p> <p>17 Arista CLI, "address-family" would be part of the</p> <p>18 command syntax, correct?</p> <p>19 MR. FERRALL: Objection. Calls for a</p> <p>20 hypothetical.</p> <p>21 THE WITNESS: If that were true, then it</p> <p>22 would be a subset, a prefix of a command; that's</p> <p>23 true. The question you asked concerned the command</p> <p>24 syntax section of the document --</p> <p>25 ///</p>

<p style="text-align: right;">Page 106</p> <p>1 BY MR. PAK:</p> <p>2 Q. No, that's not my question.</p> <p>3 So can you please keep this question in 4 mind.</p> <p>5 So my question is: Isn't it true, 6 Mr. Sweeney, that each of the multiple word command 7 phrases that appear in Exhibit 120 is part of the 8 command syntax for CLI commands that are used in 9 Arista CLI?</p> <p>10 A. Well, exactly. And this is the section of 11 this document you're asking me to check this with. 12 And in the command syntax portion of -- of the 13 section it doesn't list this.</p> <p>14 Q. So my question, just to be clear, my 15 question isn't asking you about the descriptions of 16 the manual. I would like to give you the 17 opportunity to check the manual, if necessary.</p> <p>18 But what I'm asking you about is these 19 command syntax for CLI commands that are actually 20 used in the Arista CLI.</p> <p>21 So let's go back and let me ask the 22 question again.</p> <p>23 Isn't it true, Mr. Sweeney, that each of 24 the multiple word command phrases that appear in 25 Exhibit 120 is part of the command syntax for the</p>	<p style="text-align: right;">Page 108</p> <p>1 upon this document, no.</p> <p>2 BY MR. PAK:</p> <p>3 Q. Okay. And so you don't -- sitting here 4 today, you don't know this particular command syntax 5 for all the commands that are identified here in 6 Arista CLI, sitting here today?</p> <p>7 A. How many entries are in this list?</p> <p>8 Q. There's over 500.</p> <p>9 A. No.</p> <p>10 Q. Okay. And so the one command that you 11 identified so far where you saw a discrepancy in the 12 documentation is address family -- "address-family" 13 on Page 1514.</p> <p>14 Do you see that?</p> <p>15 A. I do.</p> <p>16 MR. FERRALL: Objection. Mischaracterizes 17 the testimony.</p> <p>18 BY MR. PAK:</p> <p>19 Q. Mr. Sweeney, you would acknowledge that on 20 the same manual description, under "Example," there 21 is a command syntax "sharp address-family ipv6."</p> <p>22 Do you see that?</p> <p>23 A. I do.</p> <p>24 Q. Okay. You're not -- you don't -- you're 25 not certain, sitting here today, whether</p>
<p style="text-align: right;">Page 107</p> <p>1 CLI commands that are used in Arista CLI?</p> <p>2 Please proceed.</p> <p>3 THE WITNESS: So you want me to do --</p> <p>4 MR. FERRALL: Well, wait -- wait just a 5 second.</p> <p>6 I mean, if you -- if you want him to just 7 ask -- answer the question based upon his knowledge, 8 he can do that. If you want him to take the time to 9 compare to the documents you put in front of him, he 10 can do that too. But which is it?</p> <p>11 BY MR. PAK:</p> <p>12 Q. Well, first of all, I'm asking you your 13 knowledge, so -- and you -- free to consult the 14 manual, if necessary.</p> <p>15 But I'm asking you: Isn't it true, 16 Mr. Sweeney, that each of the multiple word command 17 phrases that appear in Exhibit 120 is part of the 18 command syntax for CLI commands that are used in 19 Arista CLI?</p> <p>20 MR. FERRALL: Based upon your knowledge, 21 you can answer the question.</p> <p>22 It's vague and ambiguous and compound.</p> <p>23 But you can answer.</p> <p>24 THE WITNESS: Based on my knowledge, I 25 don't know. It's a very, very long list. Based</p>	<p style="text-align: right;">Page 109</p> <p>1 "address-family ipv6" is a valid command syntax for 2 an Arista CLI command?</p> <p>3 A. I am not certain.</p> <p>4 Q. Okay. You can't dispute that, sitting 5 here today, correct?</p> <p>6 A. I'm sorry?</p> <p>7 Q. You don't have any knowledge one way or 8 the other on that topic, correct?</p> <p>9 A. Of -- sorry, can we just be more specific?</p> <p>10 Q. Sure. You're not disputing technically 11 that Arista's CLI actually does have a command 12 syntax "address-family ipv6" as described in this 13 manual?</p> <p>14 A. I am neither confirming it or disputing 15 it. I'm telling you I don't know. And the 16 reference I have is, at most, ambiguous.</p> <p>17 Q. Okay. So let's proceed.</p> <p>18 So what I'd like you to do is proceed with 19 your comparison of the command syntax that is 20 identified for each of the CLI commands that are on 21 Exhibit 120 and please confirm for me that, 22 according to the documentation in Exhibit 119, that 23 these commands are part of the command syntax for 24 Arista CLI commands.</p> <p>25 And to the extent that you see</p>

<p style="text-align: right;">Page 110</p> <p>1 discrepancies or exceptions, please note those on 2 the record. So go ahead.</p> <p>3 MR. FERRALL: Do you understand the 4 question?</p> <p>5 THE WITNESS: I think so.</p> <p>6 MR. FERRALL: Okay.</p> <p>7 BY MR. PAK:</p> <p>8 Q. Please proceed.</p> <p>9 MR. FERRALL: For the record, I'll object 10 as compound and vague and ambiguous.</p> <p>11 You can go ahead.</p> <p>12 THE WITNESS: I'm sorry, can you read back 13 your question one more time?</p> <p>14 MR. PAK: Sure.</p> <p>15 Q. Please proceed with your comparison of the 16 multiple words for the commands that are identified 17 for each of the CLI commands in Exhibit 120 and 18 confirm for me that, according to the documentation 19 in Exhibit 119, these multiple command words are 20 part of the command syntax for Arista CLI commands.</p> <p>21 A. So in your words, would they be a part if 22 they're not contiguous, if other words come in 23 between them?</p> <p>24 Q. What I mean "part" is that they appear at 25 least in the command syntax.</p>	<p style="text-align: right;">Page 112</p> <p>1 THE WITNESS: Okay. There's also a 2 discrepancy with the other version of the "area 3 default-cost" command, which appears on Page 10477, 4 Bates 17447. It also includes a number or IP 5 address-looking value in between the area and the 6 "default-cost" words.</p> <p>7 BY MR. PAK:</p> <p>8 Q. Are you familiar with the Cisco command 9 syntax for that command?</p> <p>10 A. From memory, no.</p> <p>11 Q. Okay. Let me -- let me do it this way 12 because it's clear to me that for many of these 13 commands you just don't know personally, sitting 14 here today, what the command syntax is; is that 15 true?</p> <p>16 A. There are many of them where I will not be 17 positive that I know their exact syntax, no.</p> <p>18 Q. And even if you read the manual, sitting 19 here today, without actually checking the actual 20 command interface, you're not sure whether the 21 manual is accurately describing the command syntax 22 in its entirety?</p> <p>23 A. It's a very large manual. It's hard to 24 know exactly when everything is correct, yes.</p> <p>25 Q. Okay. So why don't I skip this exercise</p>
<p style="text-align: right;">Page 111</p> <p>1 So whatever you think is a discrepancy, 2 you should just note it on the record.</p> <p>3 A. Okay. Well, for example, there's the 4 "area default-cost" command, looking at the OSPFv2 5 version.</p> <p>6 Q. Okay. And what page is that?</p> <p>7 A. That's on Page 1360, Page 17360.</p> <p>8 Q. Okay. Go ahead.</p> <p>9 A. What we can see here in the command syntax 10 description is that there's always another word in 11 between "area" and "default-cost."</p> <p>12 Q. And what is that word?</p> <p>13 A. Well, let's see, it's a number between 0 14 and 2 to the 32.</p> <p>15 Q. Okay.</p> <p>16 A. Every third minus one.</p> <p>17 Q. All right. So go ahead and please proceed 18 with your review.</p> <p>19 A. Okay. So we have the --</p> <p>20 MR. FERRALL: Let me --</p> <p>21 THE WITNESS: I'm sorry.</p> <p>22 MR. FERRALL: I should have clarified that 23 there's a foundation objection to this, too, given 24 the way this question was phrased and your answer.</p> <p>25 Go ahead.</p>	<p style="text-align: right;">Page 113</p> <p>1 for now.</p> <p>2 You are -- is command definition of the 3 CLI commands part of your job responsibility as the 4 software VP of engineering?</p> <p>5 MR. FERRALL: Objection. Vague and 6 ambiguous.</p> <p>7 THE WITNESS: I'm sorry, could you say 8 that again?</p> <p>9 BY MR. PAK:</p> <p>10 Q. Sure. As the VP of software engineering 11 at Arista, is the definition of CLI command syntax 12 part of your job responsibility?</p> <p>13 A. It's certainly not a part of my job as a 14 VP of software engineering, no.</p> <p>15 Q. Okay. Are you involved, as the VP of 16 software engineering, in defining the command syntax 17 for the Arista CLI?</p> <p>18 A. As the VP of software engineering, no.</p> <p>19 Q. Okay. As an employee of Arista, are you 20 involved in defining the command syntax for the 21 Arista CLI?</p> <p>22 A. I play a role in reviewing the CLI syntax 23 proposed by others, generally.</p> <p>24 Q. Okay. It's not a coincidence, sir, that 25 there is a significant overlap in the command syntax</p>

<p style="text-align: right;">Page 322</p> <p>1 ARISTANDCA10384101. It's an e-mail that you sent on 2 September 11th, 2013, to Bill Fenner and copied the 3 CLI Review mailing list that we talked about before 4 and the BGP mailing list.</p> <p>5 Do you see that?</p> <p>6 A. I do.</p> <p>7 Q. Do you have any reason to dispute that you 8 sent this e-mail?</p> <p>9 A. I do not.</p> <p>10 Q. And can you read just your statement at 11 the top there?</p> <p>12 A. It states:</p> <p>13 "Given that we are just reusing the IOS 14 syntax for this command, it seems fine."</p> <p>15 Q. And that's a true statement, right, sir?</p> <p>16 A. It -- it's an opinion.</p> <p>17 Q. Let me put it this way: That was your 18 opinion at the time you wrote this, correct?</p> <p>19 A. Looks like it.</p> <p>20 Q. And it's true that you did reuse the IOS 21 CLI syntax for the BGP neighbor 22 dont-capability-negotiate command; is that true?</p> <p>23 A. I don't know. We'd have to go look.</p> <p>24 Q. That's what you're representing here; is 25 that true?</p>	<p style="text-align: right;">Page 324</p> <p>1 MR. PAK: Are you disagreeing that those 2 documents were produced, sir.</p> <p>3 MR. FERRALL: I'm disagreeing that this 4 deposition should be kept open.</p> <p>5 MR. PAK: Okay. Thank you.</p> <p>6 THE VIDEOGRAPHER: This is the end of 7 DVD 4 and the end of today's deposition. Off the 8 record. The time is 6:48 p.m.</p> <p>9 (Signature having not been waived, the 10 Videotaped Deposition of Adam Sweeney, 11 Volume I, was concluded at 6:48 p.m.)</p>
<p style="text-align: right;">Page 323</p> <p>1 A. I'm sorry, what is what I'm representing 2 here?</p> <p>3 Q. Given that -- what did you mean by: 4 "Given that we're just reusing the IOS 5 syntax for this command"?</p> <p>6 What did you mean by that statement?</p> <p>7 A. Oh, I mean that Bill was proposing to use 8 the same syntax as an existing IOS command.</p> <p>9 Q. Okay. And that's the CLI syntax, correct?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. And you said: "It seems fine."</p> <p>12 That's what you said in response to that 13 proposal, right?</p> <p>14 A. I said: "It seems fine."</p> <p>15 Q. Thank you, Mr. Sweeney, for your patience.</p> <p>16 MR. PAK: I'll pass the witness.</p> <p>17 MR. FERRALL: No questions.</p> <p>18 MR. PAK: Okay. I'll -- before we close, 19 I'll note that on the record Arista produced a 20 number of documents this week from the files of 21 Mr. Sweeney. Obviously, we didn't have a chance to 22 review all of those documents. We're going to keep 23 this deposition open to discuss those documents once 24 we have a chance to review them.</p> <p>25 MR. FERRALL: I disagree.</p>	<p style="text-align: right;">Page 325</p> <p>1 DECLARATION UNDER PENALTY OF PERJURY</p> <p>2</p> <p>3 I, ADAM SWEENEY, do hereby certify under 4 penalty of perjury that I have read the foregoing 5 transcript of my deposition taken on 6 January 29, 2016; that I have made such corrections 7 as appear noted on the Deposition Errata Page, 8 attached hereto, signed by me; that my testimony as 9 contained herein, as corrected, is true and correct.</p> <p>10</p> <p>11 Dated this _____ day of _____, 12 2016, at _____, 13 California.</p> <p>14</p> <p>15</p> <p>16</p> <p>17 _____</p> <p style="text-align: right;">ADAM SWEENEY</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>

		Page 326	Page 328
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7	Reason for change: _____		6 633 Battery Street San Francisco, California 94111
8	Page No. _____ Line No. _____		7
9	Change: _____		8 Re: Cisco Systems, Inc. v. Arista Networks, Inc.
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11	Page No. _____ Line No. _____		10 Dear Mr. Sweeney,
12	Change: _____		11 The original transcript of your deposition taken in the above-referenced matter is available at
13	Reason for change: _____		12 this office for your review. If it is more convenient to read a copy of the transcript and
14	Page No. _____ Line No. _____		13 waive signature of the original transcript, please notify our office by letter sent certified or
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25	ADAM SWEENEY	DATED	24
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		Page 327	
1	STATE OF CALIFORNIA)		
)		
2	COUNTY OF SAN FRANCISCO)		
3			
4	I, James Beasley, a Certified Shorthand		
5	Reporter, do hereby certify:		
6	That prior to being examined, the witness		
7	in the foregoing proceedings was by me duly sworn to		
8	testify to the truth, the whole truth, and nothing		
9	but the truth;		
10	That said proceedings were taken before me		
11	at the time and place therein set forth and were		
12	taken down by me in shorthand and thereafter		
13	transcribed into typewriting under my direction and		
14	supervision;		
15	I further certify that I am neither		
16	counsel for, nor related to, any party to said		
17	proceedings, not in anywise interested in the		
18	outcome thereof.		
19	In witness whereof, I have hereunto		
20	subscribed my name.		
21			
22	Dated: February 2, 2016		
23			
24			
25	JAMES BEASLEY, CSR No. 12807, RPR		